



Letter to NRC
RE: Extension Request
Homestake Mining Company of California

David W. Pierce
Closure Manager

July 2, 2020

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Mr. Ron Linton, Project Manager
Project Manager, Materials Decommissioning Branch
Decommissioning, Uranium Recovery & Waste Programs
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
MS T-5A10, 11545 Rockville Pike
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Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

RE: Reply to NRC Request for Supplemental Information on Groundwater Corrective Action Program and Request for Amendment to License SUA-1471, Homestake Mining Company of California – Grants Reclamation Project: Request for Extension

Dear Mr. Linton:

On June 18th, 2020 NRC issued a request for supplemental information on the Homestake Mining Company's (HMC) Groundwater Corrective Action Program (GCAP) submitted on December 18th, 2019 (ML19354B960) and the associated Environmental Report submitted on February 28, 2020 (ML20080M078). HMC is submitting this request to extend the due date of the RSI responses from September 16, 2020 (90 days as referenced in the letter) to November 15, 2020 (150 days). The basis for the extension request is outlined in the paragraph below.

Since submittal of the GCAP, HMC has continued to refine the groundwater model. In addition to changes in the modeling code used, the calibration period for the model has been extended, and dual domain porosity has been added. These updates have led to a significant change in the results presented in the GCAP alternatives. In order to adequately address the RSIs, the modeling reports and pertinent sections of the GCAP itself will need to be updated and revised for submission to NRC for inclusion in its review. The technical staff producing the groundwater modeling and geochemistry support are also being utilized to develop the work for the CERCLA process that is happening in parallel with the NRC regulatory process.

In addition to the technical and time limitations articulated above, the COVID-19 pandemic has created a unique, unprecedented, and unforeseeable circumstance with regards to work associated with the Grants Reclamation Project. The number of confirmed cases within the state have exceeded 12,000 and the most recent data available shows no change to the steady increase in cases. The mitigation strategies

implemented by HMC, as well as declarations imposed by the State of New Mexico in response to the pandemic, have limited the staff's ability to access files and sources materials as well as affect our ability to effectively communicate within the company and with the involved consultants.

This additional 60 day period will allow HMC sufficient time to complete the updates and revisions to the necessary reports and provide responses to address NRC's RSIs adequately within the significant constraints on staff interaction and travel during this period.

Thank you for your time and attention on this matter. If you have any questions, please contact me via e-mail at dpierce@barrick.com or phone at 505.238.9701.

Respectfully,



David W. Pierce

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Copy To:

M. McCarthy, Barrick, Salt Lake City, Utah (electronic copy)
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